



February 6, 2006

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: CTC Communications Corp. Certification of CPNI Filing
EB-06-TC-060, WC Docket No. 06-36**

Dear Ms. Dortch:

CTC Communications Corp. ("CTC") and its affiliated telecommunications companies, CTC Communications of Virginia, Inc. ("CTC-VA"), Connecticut Broadband, LLC (f/k/a/ Partner Communications) acquired in late October 2005, Connecticut Telephone and Communication Systems, Inc., acquired in late October 2005, and Lightship Telecom, LLC, acquired in late May 2005 (collectively the "Affiliated Companies"), pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006¹ and the Commission's rules requiring that all telecommunications carriers protect the privacy of customer proprietary network information ("CPNI"),² submits this Certificate and accompanying Statement. CTC takes its responsibility to assure the confidentiality of its customers' CPNI very seriously. CTC is also cognizant of the media reports regarding release of subscriber information and assures the Commission that it protects such information and does not allow it to be released to unrelated third parties for any reason.

As requested by the Public Notice, the undersigned, as an officer of CTC and CTC-VA, certifies, based upon personal knowledge and belief, that the following Compliance Statement accurately describes the efforts of these two companies to protect the privacy of its customers' CPNI in compliance with the Commission's CPNI rules. Such certification pertains solely to the operations of CTC and CTC-VA. CTC is currently in the process of auditing the CPNI policies and procedures of the other Affiliated Companies and can not, at this time, make a similar certification.

¹ *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").

² 47 C.F.R. §64.2000, *et seq.*

No Third Party Disclosure of CPNI

Because CTC and CTC-VA take very seriously their obligations to protect against disclosure of CPNI, CTC and CTC-VA do not use, disclose or provide access to CPNI to third parties that are not agents, independent contractors, or joint venture partners of CTC or CTC-VA. Disclosure to agents, joint venture partners and independent contractors are made only after such entities or persons have executed a contract with CTC that includes provisions protecting the confidentiality of all confidential information made available to it by CTC. Specifically, the confidentiality provisions prohibit the agent or contractor from disclosing or using, either during or after the term of their contract with CTC, any proprietary or confidential information without CTC's prior written permission. The agreement also requires the counterparty to comply with, and carry out, all sales policies and reasonable instructions given by CTC. Further, CTC also is indemnified by the counterparty to these agreements for any breach arising from the fraudulent, unauthorized or illegal acts of the counterparty. Finally, a breach of the foregoing provisions may result in termination of the contract at CTC's discretion.

Employment at CTC is Contingent on Protecting Customer Confidential Information

Maintaining the privacy of customers' CPNI is a condition of employment at CTC, which, as of January 1, 2006, became the sole employer of all employees of the Affiliated Companies. CTC vigorously enforces violations of this duty, and will prosecute any employee that attempts to breach the privacy of customer CPNI either during employment or after leaving CTC. In July of 2005, CTC added a CPNI clause in its Employee Handbook and intends to expand its new hire training program to cover the use of CPNI.

All CTC employees are required to execute a Confidentiality Agreement upon commencement of employment with CTC. Employees acquired through the acquisition of CTC's Affiliated Companies were also required to sign CTC's standard form of confidentiality as a condition to continued employment. This Confidentiality Agreement, among other things, requires employees to hold customer information in the strictest confidentiality. This policy bars employees from disclosing such confidential information, and prohibits employees from removing confidential information upon conclusion of employment with CTC. Violation of this policy may result in, among other actions, suspension of work or termination of employment.

Customer Notice of Privacy Policy

Several years ago, CTC and CTC-VA adopted a policy of obtaining an affirmative Opt-in approval from its customers at the outset of the customer relationship to disclose and permit access to the customer's CPNI within CTC. CTC provides its end user customers not only with telecommunications services, but also with network optimization consulting services. As such, access to CPNI is a critical component of CTC's and CTC-VA's service offerings. Prospective customers are advised of this prior to signing up for service. In order to streamline the operations of CTC and its Affiliated Companies, virtually all new orders and re-contracting of customers of each of the Affiliated Companies is being done through CTC.

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The Company will be including on both its website and in its customer agreements language that describes the policies that it has in place to protect CPNI. Its website will also provide the end user with contact information for purposes of directing their CPNI privacy questions or concerns.

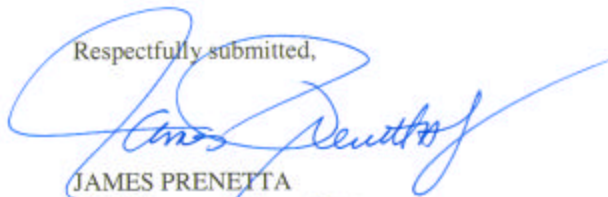
Recordkeeping

CTC maintains records of its outbound marking efforts in its customer record database. All customer service personnel, account managers and other sales personnel are required to record in the CTC database their contacts with the customer. These records are stored for at least one year.

In light of the recent troubling news reports regarding release of CPNI to third parties and our recent acquisition of Lightship Telecom, LLC, Connecticut Broadband and Connecticut Telephone and Communication Systems, Inc., CTC has been auditing the privacy protections currently in place at those companies. Concurrently with this audit, CTC has been establishing more comprehensive CPNI protections at these companies. To that end, CTC and each of the Affiliated Companies will be giving all customers that have not executed an Opt-In authorization, additional opportunities to grant or deny such company approval to use CPNI for marketing communications related-services. CTC will continue to maintain and enforce, and will be implementing procedures at the Affiliated Companies, prohibition on releasing customer CPNI to third parties and future CPNI approvals will not seek approval for release of CPNI to third parties that are not agents, independent contractors, or joint venture partners of CTC and such Affiliated Companies.

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Respectfully submitted,




JAMES PRENETTA
CTC Communications Corp.
CTC Communications of Virginia, Inc.
Lightship Telecom, LLC
Connecticut Broadband, LLC
Connecticut Telephone and Communication
Systems, Inc.

cc: Bryon McKoy via e-mail: byron.mccoy@fcc.gov
Best Copy and Printing via e-mail fcc@bcpiweb.com

Certificate

I, James Prenetta, state that I am Senior Vice President and General Counsel of CTC Communications Corp., and Vice President and General Counsel of Lightship Telecom, LLC, Connecticut Broadband, LLC and Connecticut Telephone and Communication Systems, Inc.; that I am authorized to submit the foregoing Certificate and Compliance Statement on behalf of each of these companies; and that it is true and correct to the best of my knowledge, information, and belief.



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CTC Communications Corp.
Vice President and General Counsel,
CTC Communications of Virginia, Inc.
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